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10 *Attorneys for Defendants*

11  
12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA  
14

15 *In re: Hyundai and Kia Engine*  
16 *Litigation*

CASE NO. 8:17-cv-00838-JLS-JDE

Member Cases:  
8:17-cv-01365-JLS-JDE  
8:17-cv-02208-JLS-JDE  
2:18-cv-05255-JLS-JDE  
8:18-cv-00622-JLS-JDE

Related Case:  
8:18-cv-02223-JLS-JDE

21 **DEFENDANTS' NOTICE**  
22 **REGARDING EXCLUSION OF**  
23 **COMMERCIAL ENTITIES**

24 The Hon. Josephine L. Staton  
Courtroom: 10A  
Trial Date: None Set

1 The Court's May 10 Order gave final approval to the parties' class action  
2 settlement that excluded commercial entities that regularly engage in vehicle resales.  
3 (Dkt. 202 at 3, 22.) As the Court noted in its Order, the parties had proposed  
4 sending notices to now-excluded entities who submitted claims explaining the  
5 change but that defendants are willing to consider extending benefits similar to those  
6 offered in the settlement as a goodwill gesture. (*Id.* at 26 n.18.)

7 Attached as Exhibits A and B are, respectively, Hyundai and Kia's proposed  
8 notices of exclusion to these commercial entities. The notices inform recipients that  
9 they (1) are no longer members of the settlement class as per changes in the  
10 settlement agreement; (2) are no longer bound by the settlement terms; (3) are no  
11 longer entitled to benefits under the settlement; (4) may contact defendants about  
12 potentially obtaining similar benefits; and (5) should still obtain a free Knock Sensor  
13 Detection Software installation.

14 Absent any suggested modifications by the Court, defendants will prepare to  
15 print and mail the notices to the now-excluded entities beginning on June 1, 2021.  
16 Defendants will file a supplemental notice providing the Court with a list of  
17 recipients once the notice campaign is completed.

18  
19 DATED: May 19, 2021

QUINN EMANUEL URQUHART &  
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21 Bv /s/ Shon Morgan

22 Shon Morgan

23 *Attorneys for Hyundai Motor America,*  
24 *Hyundai Motor Company, Kia Motors*  
*America, and Kia Motors Corporation.*